

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Pamela Bond, *
Plaintiff *

v. * Case No. 1:18-CV-00798-AJ

Sig Sauer, Inc. *
Defendant *

*

JOINT MOTION TO STAY

NOW COME the parties, by and through counsel, and respectfully submit the within Joint Motion to Stay, stating as follows:

1. The parties wish to stay the case in order to enable them to participate in mediation on July 22, 2020, with Attorney Gregory Clayton as mediator.

2. Discovery is presently scheduled to close on June 19, 2020, and Motions for Summary Judgement are due by July 1, 2020. Jury Selection and trial are presently scheduled to take place beginning November 10, 2020.

3. These discovery deadlines were established via an assented-to motion to extend deadlines filed on March 4, 2019, just before the Covid-19 stay-at-home orders and cancellations and work interruptions stemming from these orders.

4. For Covid-19 related reasons, deposition of the Plaintiff, which was originally scheduled to occur March 24, 2020 did not occur until May 20, 2020.

5. The Plaintiff also intends to take depositions of certain of Defendant's employees, in the event that the scheduled mediation is unsuccessful.

6. However, the parties, at this stage, believe that the likelihood of achieving settlement at the mediation will be enhanced if the Court stays the case so that they need not expend further resources on planning and engaging in discovery prior to mediation.

7. If mediation proves unsuccessful, the parties propose that the Court would lift the stay at that time, and the parties would then ask the Court to set new deadlines for close of discovery and summary judgment.

8. The relief of the stay, requested herein, does not include a request for continuance of the Final Pretrial Conference and the trial, at this time.

9. Due to the discretionary nature of the relief requested herein, no memorandum of law is required.

WHEREFORE, the parties respectfully pray this Honorable Court:

A. Stay the case pending the July 22, 2020, mediation with Attorney Gregory Clayton; and

B. Grant such other and further relief as is just and equitable.

Respectfully Submitted,

PAMELA BOND

By her attorneys,

DOUGLAS, LEONARD & GARVEY, P.C.,

Date: June 9, 2020

By: /s/ Megan E. Douglass

Megan E. Douglass, Esq. (Bar #19501)

14 South Street, Suite 5

Concord, NH 03301

(603) 224-1988

mdouglass@nhlawoffice.com

and

SIG SAUER, INC.

By its attorneys,

JACKSON LEWIS, PC

Date: June 9, 2020

By: /s/ Martha Van Oot, Esq.
Martha Van Oot, Esq. NH Bar #963
100 International Drive, Suite 363
Portsmouth, NH 03801
Martha.VanOot@jacksonlewis.com
(603) 559-2735

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was served this date upon all counsel of record via the ECF filing system.

/s/ Megan E. Douglass
Megan E. Douglass, Esq.